

The British Library

Privacy Policy

At the British Library, we care about the privacy of the people who use our Services, and this policy explains how we deal with the personal information that you give us.

This policy applies to all interactions you may have with the British Library, for example visiting our website, using our free wifi, or visiting our buildings. Depending upon which of our Services you use or how you contact us, we may also need to provide you with additional information about the use of your personal information – this extra information can be found on the Service specific pages linked to on the right of this page.

Please note that we explain many of the terms used in this policy on our [Definitions](#) page.

1. What type of information does the British Library collect about you?

- 1.1 We may collect certain personal information which (either on its own or when combined with other information we hold about you) allows us to identify you as an individual and which is about you.
- 1.2 We may collect a number of different types of personal information from you depending on which of our Services you choose to use, but which may include all or any of your:
 - title
 - first name
 - surname
 - login credentials (including username and password)
 - postal address (including billing/shipping addresses and postcode)
 - telephone number (including home and mobile phone numbers)
 - photograph (for example when you register as a reader with the Library, or those taken at our events)
 - email address
 - social media account ID (including your Facebook username and Twitter handle)
 - device information (such as MAC address, IP address, operating system and browser type)
 - location information (such as a GPS signal emitted by your mobile device)
 - age
 - date of birth
 - gender
 - information necessary for legal compliance (including details of ethnicity or disability/access requirements)
 - payment information (such as debit or credit card details)

- educational institute details (such as your school, university or college)
- marketing preferences (for example where you have opted in to receive our newsletter(s))
- reason(s) for contacting us, such as enquiries or requests
- opinions, preferences, feedback, complaints, comments and/or suggestions (including comments made on our social media pages and online discussion forums)
- online browsing habits, activities and behaviour (such as which of our web pages you have visited and when you visited them)
- visit history, habits, activities and behaviour (such as when you visited our buildings, or whether you attended as part of a group)
- preferences, access needs and dietary requirements
- employment related information (if you apply for a job, placement, internship or volunteer post)
- security related information (such as proof of address if you register to become a reader, security incident reports, or CCTV footage of our public areas)

This list is not intended to be exhaustive and may be updated from time to time as our business needs and legal requirements dictate.

- 1.3 We will normally collect personal information directly from you when you volunteer it to us, or when we gather it from your use of our Services. We try to limit our use of personal information to the details we need to provide the requested or agreed Service for you.
- 1.4 Where possible, we collect and use details which do not identify you as a named individual, such as website usage information, aggregated information and statistics and other details of how you use our online content and Services. Some of this information may involve the use of cookies and web beacons. Please see the **Depersonalised & Anonymous Information** section below, as well as our [Cookie Policy](#) for more information.
- 1.5 However, we may also collect information from and/or combine your personal information with information from other sources. We only do this where lawful to do so. Please see the **How does the British Library collect your personal information?** section below.
- 1.6 We do not normally collect any Sensitive Personal Information from or about you, and do not wish to do so unless it is absolutely essential. We may on rare occasions collect and use your Sensitive Personal Information, such as dietary or access and assistance requirements which may indicate a health condition or illness, or other Sensitive Personal Information details which are volunteered or provided by you. If we need Sensitive Personal Information we will ask you to provide us with necessary details only. For example, we may need to collect Sensitive Personal Information when you register to become a Reader so that we can help you with any access requirements you might have, and to comply with our legal obligations under equality legislation. In other cases, we will collect and use this type of information only with your clear consent. Please do not provide us with Sensitive Personal Information under any other circumstances.
- 1.7 We may store your personal information in electronic and/or hard copy format.

1.8 To understand why we collect and further use your personal information please see the **Why does the British Library use your personal information** section below.

2. How does the British Library collect your personal information?

2.1 This policy applies to any personal information that we collect through our Data Collection Media, which include our:

- physical sites (including the staff, systems and equipment located in our buildings in London St Pancras, Boston Spa, and Stockton-on-Tees)
- websites and micro sites as may be updated and/or extended from time to time, including our main website at www.bl.uk, and the individual web portals associated with our Services
- mobile sites and applications
- other online/mobile interactive features
- official social media pages
- communication channels (telephone, SMS/text message, email and fax)

2.2 We collect your personal information through our Data Collection Media whenever you use any of our Services, including using our website or visiting our buildings.

2.3 The British Library may also collect your personal information from (and/or combine it with information from) other sources, such as:

- individuals and/or organisations where you have confirmed that they may provide your personal information to us
- government, tax or law enforcement agencies
- other sources, such as when information about you is volunteered by a third party e.g. mentioned in a complaint, or part of a group booking arrangement that they facilitate

2.4 On some occasions we may also collect your personal information from public sources where it is fair and lawful to do so. For example, we may use publicly available information to track down the owner of certain intellectual property rights. These sources may include Google or other internet search engine results, or publicly available data from Facebook, Twitter and similar social media, or other information in the public domain.

3. Why does the British Library use your personal information?

- 3.1 The Library may use your personal information for a variety of purposes, depending upon the Service you have requested or are using. Quite often we will use your data simply to fulfil a request that you have initiated, such as to deal with your enquiry, give you access to the Library, provide a requested book to you, send you tickets to an event, or otherwise to provide you with and enable you to use our Services.
- 3.2 The Library may also use your personal information to manage and develop the Services that we offer, for example to:
- ensure that our relevant data collection media and Services are provided in the most effective manner for you and the device you are using
 - manage and improve our data collection media and Services
 - review and analyse your use of our data collection media and Services in order to develop and improve the quality of our offering and strengthen our relationship with you
 - personalise our data collection media and Services and present you with content and information (including advertisements) which are tailored to you
 - contact you if we have not heard from you for a certain amount of time
 - invite you to provide feedback, assist with surveys and input into consultation exercises
 - provide you with administrative information and/or service announcements and updates (including changes to our policies and terms)
 - ensure our records are accurate and up to date
 - perform any contract the Library has with you (for example where you make a purchase in connection with any of our Services and we need to process your payment and/or deliver something to you)
 - administer our legitimate internal management analysis, audit, forecasts and business planning and transactions
 - enforce our rules and policies, and maintain our security (for example our rules about handling Collection items).
- 3.3 Other uses of personal information will be to ensure that the Library can meet its legal, regulatory and good governance obligations (and regulator's expectations), such as to:
- meet audit requirements.
 - comply with our legal obligations and to perform our statutory and public functions and duties
 - help ensure your safety and the security of our premises and Collections
 - establish, defend or exercise our legal rights
 - comply with orders/requests received from the public and regulatory, governmental and judicial bodies

- comply with our legal, regulatory and internal governance obligations (for example record retention policies)

3.4 In addition, where agreed with you, we may tailor our communications and dealings with you to better reflect your needs and preferences, such as sending you newsletters with your preferred topics highlighted, or to inform you that our shop offers a book relevant to an event you are attending, or to make you aware that an event similar to one recently attended by you is being scheduled. Specifically, where you have given your consent we may use your contact details to:

- send you direct marketing communications (including e-mail marketing and fundraising communications), with your consent where required
- run marketing campaigns, competitions, prize draws and promotions

3.5 We may also convert personal information into depersonalised (“pseudonymous”) data or anonymous data and use it (normally on an aggregated statistical basis) for research and analysis to improve our Services, processes and performance. For more information, please see the **Depersonalised and Anonymous Information** section directly below.

3.6 In carrying out the above, the Library processes your personal data in a variety of ways, each of which may have a different legal basis. We may process your personal data because:

- You have given your consent (e.g. for the provision of marketing correspondence)
- It is necessary for the performance of a contract with you (e.g. the purchase of tickets or other goods or services)
- We are under a legal obligation to do so (e.g. for equality monitoring or health & safety purposes)
- It is in the public interest and in the performance of our official duties (e.g. the provision of access to, and the security of, our Collections as set out in the British Library Act 1972)

We will inform you of the specific legal basis that applies to the processing of your data either at the point of collection, or in the Service specific pages linked to on the right of this page.

4. Depersonalised and Anonymous Information

- 4.1 Depersonalised or aggregated information does not personally identify you. It may be used for statistical analysis and administration, including analysis of trends, carrying out actuarial work, tailoring products and Services, risk assessment and analysis of costs and charges in relation to our Services.
- 4.2 We may automatically collect certain information from you (such as usage information) when you use our data collection media, through the use of web beacons, device identifiers, pixel tags, cookies and similar technologies. We may combine this information with other personal information that we have collected from or about you in order to learn more about how you use our data collection media and Services so that we can improve our Service offering.
- 4.3 To find out more about how we collect and use this automatically collected information, please see our [Cookies Policy](#).

5. Does the British Library share personal information with third parties?

- 5.1 Your personal information will be made available to those members of our staff who need to see it in order to perform their functions/roles/responsibilities at the Library in respect of the Services you have requested or agreed to use.
- 5.2 Your personal information may be held by us in one or more customer relationship management or CRM database(s), consolidating details of your dealings with the Library across various Services, to ensure we have clear and accurate records about your use of our Services, to better understand your requirements and how we might provide other Services to you. For instance, the Library may assess your attendance at events, against your purchases from our shop, in order to consider making you aware that event specific products may be purchased from our shop.

Please note: Details relating to the specific Collection Items that you have requested during your use of our Collections (for example through use of our Reading Rooms or our remote Services such as Document Supply) will never be used to provide marketing analysis or similar functions (for example, to send you personalised marketing material), but may be used on an aggregated and depersonalised basis for Service improvement purposes (for example, to determine whether we are purchasing enough journals in a specific foreign language to match our Readers' research interests).

- 5.3 In addition, the Library makes use of expert third party service providers to perform functions and/or provide services on our behalf (such as website hosting, payment services, logistics, customer services, IT, marketing, and security). These third party service providers ("Data Processors") may use your personal information in order to assist the Library, or to provide the agreed Service to you on our behalf. Where this is in relation to a specific Service you will be informed of the identity and location of the relevant Data Processor, either at the

point of data collection, or in in the Service specific pages linked to on the right of this page. All of our Data Processors are bound by strict contractual terms in order to ensure that your personal information will be protected appropriately.

5.4 We may share personal information within the Library's advisory boards, panels and councils as needed for reasonable management, analysis, planning and decision making, including in relation to taking decisions regarding our Service offering, order or customer request fulfilment.

5.5 Where thought necessary by the Library, in limited cases, your personal information may also be shared with other people and organisations outside the Library to the extent permitted or required by law. For example, we may provide your personal information to:

- third parties who will use your personal information for their own purposes and/or in partnership with the Library (such as partners, advertisers, and social networking sites where the Library maintains an official presence). Please note that these third parties may have their own policies that govern their websites and how they collect and use personal information.
- government authorities, law enforcement and regulatory authorities where required or permitted by law, and for tax or other lawful purposes
- external parties in response to legal process, and when required to comply with laws, to respond to an emergency, or to enforce our agreements, policies, rules and terms, or to protect the rights, property or safety of our staff, agents, customers and other users of our Services
- parties to whom you authorise us to release your personal information
- other entities (including actual or prospective buyers of one of our Services) in the event that we are involved in a reorganization, divestment, or sale of any of our organisation and/or assets.

Where this is in relation to a specific Service you will be informed of the identity and location of the relevant recipient, either at the point of data collection, or in in the Service specific pages linked to on the right of this page.

5.6 Please note that certain individuals who will see your personal information may not be based at the Library or in your country (please see **below**).

6. Will the British Library send your personal information overseas?

- 6.1 You should be aware that the recipients of your personal information (as set out **above**) may be located in countries or territories outside the European Economic Area (“EEA”) which may not have data protection laws equivalent to those in the UK.
- 6.2 Where we (or a Data Processor acting on our behalf) transfer your personal information to countries outside of the EEA, we will put in place such other measures as are required by law to ensure that those transfers are adequately protected. Where this is in relation to a specific Service you will be informed of the identity and location of the relevant recipient, either at the point of data collection, or in the Service specific pages linked to on the right of this page.

7. What are your choices relating to contact from us?

- 7.1 We may contact you with information that may affect your use of a service, for example, disruptions to Services, reading room closures, lost property, or problems with orders, or to request your feedback in relation to those services. Administrative e-mails may also be sent automatically following certain actions, for example, welcome e-mails when you register for a Service. Please note that you will not be able to unsubscribe from administrative and Service-related communications unless you unsubscribe from the relevant Services.
- 7.2 We may wish to provide you with information about new Services, including products, events, courses, collections, promotions and offers from the Library which may be of interest to you, and we may invite you to take part in market research. We may contact you by email (or in some cases by mail) to tell you this information, but we will obtain your consent before contacting you with “direct marketing” in this way.
- 7.3 We will ensure that any direct marketing communications that you receive from the Library provide a simple way for you to decline or change your mind about further marketing. For example, in emails the Library may provide you with an ‘unsubscribe’ link, or an email address to which you can send an opt-out request. The Library will take steps to stop any direct marketing to which you object, or in respect of which you withdraw your consent, within one calendar month being told of your objection or withdrawal of consent.
- 7.4 If you tell us that you no longer wish to receive the Library’s direct marketing communications we will take steps to respect your modified direct marketing preferences and will keep a record of your request so as to avoid contacting you again in the future with direct marketing content.

8. How does the British Library keep your personal information safe?

- 8.1 The Library takes steps to seek to protect the security of your personal information, in accordance with our legal obligations, and as set out in our **Information Security Policy**.
- 8.2 Please note that we cannot guarantee the security of any transmission of personal information over the Internet. Communications sent over the Internet, such as emails, are not secure, although their security may be increased if they have been encrypted. While we strive to protect your personal information, we cannot guarantee the security of any information transmitted to us over the internet. Therefore, please do not submit personal information to us online unless you accept the security risks of doing so.

9. What are your rights in relation to your personal information?

- 9.1 You have a number of rights in relation to your personal information, although in some cases these rights are subject to certain conditions and limitations. You are entitled to:

- request copies of, and/or access to your personal information. Please note that you can view your online profile relating to our Services via the [My Account](#) Service.
- request that your personal information be corrected where inaccurate or incomplete
- request that your personal data be deleted (or that we stop using your personal data) where it is no longer necessary. This right normally only applies where your information was provided or processed on the basis of consent, or in the performance of a contract with you which lapsed more than six years ago.
- request that we stop sending you direct marketing communications.

- 9.2 If you would like more details about these rights as they apply to a specific Service of the British library, or to exercise any of your rights, please contact our Data Protection Officer at:

Corporate Information Management Unit
The British Library
96 Euston Road
London
NW1 2DB

Email: dp@bl.uk

To help us identify the personal information you are referring to, please include any details that will enable us to locate the relevant personal information.

- 9.3 In order to be sure that your personal information is not disclosed to an imposter, we may require you to provide us with proof of identity before any action is taken or personal information is disclosed.
- 9.4 Any request that you send to us in relation to your rights will be processed within one calendar month of the Library accepting your request.

- 9.5 If after receiving a reply from us you are still unhappy with our response to such a request you may complain to the Information Commissioner's Office (ICO). Details on how to do so can be found on the ICO's website at <https://ico.org.uk/>.

10. Retaining your personal information

- 10.1 We will keep your details on record until we have completely dealt with your request, enquiry, or our contract with you, and then for a reasonable period afterwards, in accordance with data protection and other applicable legislation, as set out in our [Records Management Policy](#).
- 10.2 The Library may keep your details on record for as long as is necessary for the purposes for which it may use your personal information. Where this is in relation to a specific Service you will be informed of the retention period, either at the point of data collection, or in in the Service specific pages linked to on the right of this page. When the Library decides that holding your details is no longer necessary we will securely delete / destroy your details.
- 10.3 In general, and where not related to a specific Service we will retain the personal information that you have provided to us for seven years since your last contact with us, for the purposes of audit, analysis and customer management, and the defence of legal claims.

11. Other Information

- 11.1 Certain Services, such as our document supply service, allow nominated administrators within an organisation to set up and manage a corporate account by controlling the level of use by their colleagues, and adding or removing names from the corporate account. Individuals using a corporate account should consult their organisation's policies for the terms and conditions under which they may use their organisation's corporate account.
- 11.2 Our website and the electronic resources provided in our Reading Rooms contain extensive links to other independent websites that are not controlled by the British Library. This policy applies to the direct use of our Services and Data Collection Media only. You are strongly advised to consult the privacy policies of other websites you visit for information about their policies and practices.
- 11.3 Online payments by credit or debit cards for some Services provided by the Library are processed under contract using specialist Data Processors. When a payment is processed by Data Processor acting on our behalf, card details are collected over a secure link and protected by industry standard software which encrypts your information. We do not collect any payment card account details and they are not made available to us. Our service provider will use the information you provide to process your payment or to refund any monies due to you. Please refer to the terms and conditions for the relevant Service for

further details. Payments processed on behalf of the Library are managed in line with the Payment Card Industry Data Security Standard.

12. Changes to this Privacy Policy

- 12.1 We may change this policy from time to time to reflect changes in the law and/or our privacy practices. We will update the date at the bottom of this page whenever we do that.
- 12.2 We encourage you to check this policy for changes, for example when you revisit our websites. In the event of a major change to our policy we will contact you to inform you of the change.
- 12.3 By submitting your personal information to us, you are indicating that you understand how we use your personal information, as described in this policy.

13. Contact Us

If you have any questions about this Policy, please contact our Data Protection Officer at:

Corporate Information Management Unit
The British Library
96 Euston Road
London
NW1 2DB

Email: dp@bl.uk

Last Updated: 18 May 2018

Definitions

Data Collection Media	The various different IT systems and other processes that we use to support and provide our Services
Personal Information	Information which is about you, and which (either on its own or when combined with other information) could be used to identify you as an individual
Sensitive Personal Information	Personal Information which relates to “Special Categories” of information defined in the General Data Protection Regulation 2016 (such as racial or ethnic origin, political opinion, religious or philosophical beliefs, Trade Union membership, genetic data, biometric identifiers, physical or mental health conditions, alleged offences and convictions, or sexual life), as well as other personal information that warrants a higher level of protection such as personal financial details.
Service(s)	<p>The various different services, functions and/or facilities offered by the Library from time to time. Our Services include our:</p> <ul style="list-style-type: none">• Reading Rooms and remote Collection services (including our online document supply service, our online theses database and our digital library and web archives)• information resources (including our websites, applications and newsletters)• online and physical shops• Business and IP centre consultancy services• online image facilities• exhibitions, events and tours• WiFi service• education & learning programmes• donation facilities• membership schemes and registered accounts• PLR author administration services
Library, Our, We and/or Us	The British Library
You and/or Your	The individual using our Services, for example our Readers, customers, visitors, donors, or other users.

Business & IP Centre

When you engage with our Business & IP Centre (BIPC) we will collect information about your business (potentially including financial information), as well as your contact details, and certain other data required to meet equality monitoring requirements (which will include Sensitive Personal Information in relation to your ethnicity and gender).

We will use your personal information to provide you with the Services that you have requested from us, such as workshop bookings, attendance at events, advice sessions, and similar business support activities (e.g. in the performance of a contract with you). We will also use your contact information in order to supply you with relevant transactional documentation.

We may use your contact information to contact your business with information about our Services which we believe may be of interest to you. This is on the basis of our legitimate interests, as set out in the Privacy of Electronic Communication Regulations 2003 (as amended), which covers business to business email communications.

Many of the services that we offer through the BIPC are funded by the European Regional Development Fund (ERDF), which is administered by the Greater London Authority (GLA). Where the services that you have requested are funded by the ERDF we have a legal obligation to provide GLA and ERDF with your information for audit purposes, in order to ensure proper use of EU funding and that equality and diversity obligations are being met.

Many of the services that we offer through the BIPC are also available through our partner organisations in the **British Library Business & IP Centre National Network** (<https://www.bl.uk/business-and-ip-centre/national-network>). We may share your information with our partners in the Network as necessary to provide you with the services you have requested, and to carry out our legitimate interests in monitoring, auditing, and developing the services of the Network. Our Network partner organisations may also use your information for the same reasons.

The services that you have requested will be provided by a variety of third party consultants who will be experts in the relevant field. We will share your information with them for the purpose of providing the services, and they may also use your information to offer you further support outside of the Library's service provision.

We may use various organisations to provide IT capabilities in support of our Services, and who may process your information on our behalf. These Data Processors will process your information only under contract to the Library, and may not use your information in any other way. In particular, we use the following systems to process your information:

- We use Hubspot, from Hubspot Inc., for marketing services. Hubspot may process your information in the United States, and is certified under the Eu-US Privacy Shield Framework in order to implement appropriate safeguards in relation to your information. Hubspot's Privacy Policy can be found at <https://legal.hubspot.com/privacy-policy>.
- We use Basecamp, from Basecamp LLC, to administer the BIPC Centre National Network. Basecamp may process your information in the United States, and is certified under the Eu-US Privacy Shield Framework in order to implement appropriate safeguards in relation to your information. Basecamp's Privacy Policy can be found at <https://basecamp.com/about/policies/privacy>.

If you engage with a BIPC service which is funded by the ERDF we will retain your information for 15 years, in accordance with the provisions of our EU funding agreement. If you engage with any other service we will retain your information for the current year plus a further six years after the date of your transaction in order to comply with tax and accounting rules.

CCTV

The British Library uses CCTV, and other related technologies such as passive terahertz body scanners, on all of our physical sites for the purposes of safety and security management. We do this in the performance of our public task to protect the UK's national collection of its published output, and in order to protect the vital interests of our staff and visitors.

CCTV footage is retained for 31 days before being automatically overwritten, and security scan records are retained for 24 hrs, unless deliberately archived for evidential purposes in the event of a security incident.

Upon request, we will routinely provide copies of our CCTV records to the police in the performance of their legitimate duties.

Collection Materials

The British Library collects the published output of Great Britain, and has over 150 million items in its Collections. Our Collections contain personal data in many forms; in newspapers, radio recordings, oral history interviews, modern literary archives, electoral rolls, and in our archival copy of the .uk web domain.

We collect, catalogue, and make available our Collections (and the personal data contained within them) as part of the performance of a task carried out in the public interest, e.g. as the national and legal deposit library of Great Britain. Further details about our public task can be found **here**.

Where Sensitive Personal Data is found in our Collections it is processed for the purpose of archiving in the public interest. Where such data would be likely to cause substantial distress or harm to the data subject if disclosed it will be withheld from public access, but will still be retained in our Collections.

Personal data contained in our Collections will be retained in perpetuity, so as to inform the research of future generations.

Customer Account Management

When you access one of our Services you will normally be asked to create a customer account. Your central customer account will consist of your contact details, security details such as login and password, and details of the Services to which you subscribe.

We will use these details to give you access to the Services that you have requested, as part of a task performed in the public interest. Further details about our public task can be found **here**.

We may also use this data (and other data relating to your use of our Services such as audit trails) for the purpose of analysis in support of service improvement, IT security, Collection security, or other legitimate interests of the Library.

You can access your account at <https://myaccount.bl.uk/Ui/MyAccountLogin.aspx> for individuals (or <https://businessaccount.bl.uk/Ui/BusinessAccountLogin.aspx> for businesses), in order to make corrections to your personal information or manage your subscriptions to our Services.

We will retain Customer Account management information for as long as your account remains current plus a further six years in order to comply with tax and accounting rules and to provide evidence in the face of future complaints or legal claims.

Fundraising & Development

The British Library is required to generate a proportion of its income from commercial activity and philanthropic donations. As such we carry out fundraising research in order to understand the background of people who may support us, and to help us to make appropriate requests to supporters who may have the desire to donate to the British Library.

From time to time we may analyse our database to find people who we think might be able to support us based on factors such as previous contributions, transaction history and demographics. In doing so we may use profiling techniques or use third party wealth screening companies and insight companies to provide us with general information about our donors or potential donors. Such information is compiled using publicly available information, information that has already been provided to us through the use of our Services, or information shared by other organisations where they have been given consent to do so.

We will not send fundraising and development marketing to users of our Services unless you have specifically consented to receive marketing communications from us. We may however make direct funding applications and approaches to known philanthropic donors or other high profile supporters of the Library through their charities, foundations, agents, or private offices.

All of our fundraising and development activities are carried out on the basis that they are in the legitimate interests of the British Library, and that the personal data is processed in such a way that the interests, fundamental rights, and freedoms of our donors and potential donors are properly protected.

In our fundraising database we process personal information relating to the identity of our potential or actual donors, their family, employment history, social activities, interests, and financial status and philanthropic activities. In relation to our actual donors we also process their bank and GiftAid details in order to manage their donations.

General information about donors or potential donors is retained for as long as it remains current and of potential use, after which it is deleted. Transactional information about donations is retained for the year in which the donation was made plus a further six years for tax and accounting purposes.

We have chosen to register with the Fundraising Regulator and adhere to their Code of Fundraising Practice. We ensure that all our fundraisers and third parties do so. Information about our donors may be used to ensure that we comply with the Fundraising Regulator's Code of Fundraising Practice, which stipulates that we must take steps to assess and manage risks to our work and reputation with regard to certain levels of donation. More details can be found at www.fundraisingregulator.org.uk.

Commercial Services (incl. Ethos, BL On Demand, & Imaging Services)

When you engage with one of our commercial Services you will normally be asked to create an account, either as a business or as a private individual. We will collect details about you (and your company), as well as contact details and payment information.

We will use your personal information to provide you with the Services that you have requested from us, such as document supply or imaging services (e.g. in the performance of a contract with you), and to supply you with relevant transactional documentation.

We may also use your contact information to contact your business or organisation with information about our Services which we believe may be of interest to you. This is on the basis of our legitimate interests, as set out in the Privacy of Electronic Communication Regulations 2003 (as amended), which covers business to business email communications.

We may analyse your transactions with us to carry out our legitimate interests in monitoring, auditing, and developing the Services that we provide.

We will retain your account information for as long as it remains current. Transactional information will be retained for the year in which the transaction took place, and then for a further six years in order to comply with tax and accounting rules.

Many of our commercial Services allow nominated administrators within an organisation to set up and manage a corporate account by controlling the level of use by their colleagues or students, and adding or removing their names and contact details from the corporate account. If you are using a corporate account you should consult your organisation's policies for the terms and conditions under which you may use your organisation's corporate account, and information on how your personal information is being used in that context.

Education & Learning

In this section, please read all instances of “you” to include “your child(ren)” in those cases where you provide us with information about minors who are in your care.

When you engage with our Education and Learning Services we will collect information about your school (where relevant), as well as your contact details, and certain other data required to ensure that your visit is safe (which will include Sensitive Personal Information in relation to your special needs or dietary requirements).

We will use your personal information to provide you with the Services that you have requested from us, such as school workshops, teacher events, family events, or adult learning courses (e.g. in the performance of a contract with you). We will also use your contact information in order to supply you with relevant transactional documentation. We will use the Sensitive Personal Information that you provide to ensure that your use of our Services is safe (e.g. in the vital interests of the data subject).

We may use your contact information to contact your school with information about our Services which we believe may be of interest to you. This is on the basis of our legitimate interests, as set out in the Privacy of Electronic Communication Regulations 2003 (as amended), which covers business to business email communications.

We may analyse information about your transactions to carry out our legitimate interests in monitoring, auditing, and developing our Learning & Education Services.

Please note that photography (both video and still) for publicity purposes is often undertaken at our events, either by us, by third party photographers acting on our behalf under contract, or by media organisations. Such photography will primarily be focussed on groups and activities rather than on individuals. If you have any objection to such photography please make this known to a member of staff at the event. If we wish to take individual photographs or video recordings that are specifically focussed on you then we will always ask for your specific consent at the time.

We may use various organisations to provide IT capabilities in support of our Services, and who may process your information on our behalf. These Data Processors will process your information only under contract to the Library, and may not use your information in any other way. In particular, we use the following systems to process your information:

- We use Google Drive, from Google Inc., to coordinate and administer our education and learning activities. Google may process your information in the United States, and is certified under the Eu-US Privacy Shield Framework in order to implement appropriate safeguards in relation to your information. Google’s Privacy Policy can be found at <https://policies.google.com/privacy>.
- We use WeTransfer, from WeTransfer B.V, to transfer photographs between us and our photographers. WeTransfer’s Privacy Policy can be found at <https://wetransfer.com/legal/privacy>.

We will retain your information for the current year plus a further six years after the date of your transaction in order to comply with tax and accounting rules. Photos taken for publicity purposes will be retained indefinitely.

Marketing

The British Library is required to generate a proportion of its income from commercial activity and philanthropic donations. As such we carry out direct marketing activities in order to inform our potential customers of our new events, products, and services, and to help us generate interest in the activities British Library.

We will not send marketing material to you unless you have specifically consented to receive marketing communications from us. If you wish to withdraw your consent in relation to the receipt of marketing communications you may do so at any time by clicking on the unsubscribe link at the bottom of our marketing emails, or by writing to us.

We may however send marketing material to business contacts, commercial organisations, charities and other legal persons. This is on the basis of our legitimate interests, as set out in the Privacy of Electronic Communication Regulations 2003 (as amended), which covers business to business email communications.

We may use various organisations to provide IT capabilities in support of our Services, and who may process your information on our behalf. These Data Processors will process your information only under contract to the Library, and may not use your information in any other way. In particular, we use the following systems to process your information:

- We use Communicator, from The Communicator Corporation Ltd., to manage and distribute our marketing correspondence. Communicator's Privacy Policy can be found at <https://www.communicatorcorp.com/service-privacy-policy>.
- We use Google Drive, from Google Inc., to coordinate and distribute feedback surveys. Google may process your information in the United States, and is certified under the Eu-US Privacy Shield Framework in order to implement appropriate safeguards in relation to your information. Google's Privacy Policy can be found at <https://policies.google.com/privacy>.

We also use Model Citizens (<https://www.model-citizens.co.uk/>) as analysts and advisors to help us aggregate our customer data in a 'single customer view' for marketing analysis purposes.

We will retain your marketing related information (such as contact details, preferences, and engagement with our content) for as long as your relationship with the British Library continues, plus a further six years after the date of your last interaction with us so as to provide evidence in the face of future complaints or legal claims.

Where your contact information is held solely for marketing communications and no other purposes you have the right to ask us to delete it. To do so please contact our Data Protection Officer at:

Corporate Information Management Unit
The British Library
96 Euston Road
London
NW1 2DB

Email: dp@bl.uk

To help us identify the personal information you are referring to, please include any details that will enable us to locate the relevant personal information.

Membership

When you purchase or activate a British Library Membership (either as an individual or a couple) we will collect your contact details and payment information, as well as your date of birth. Your date of birth is required to ensure our compliance with licensing rules in relation to your access to the Knowledge Centre Bar which forms part of your Membership.

We will use your personal information to administer your Membership benefits (e.g. in the performance of a contract with you), which includes sending out your Membership Pack and What's On Guide.

We will also use your contact details to supply you with relevant transactional documentation, such as renewal information.

As part of your Membership we will also contact you from time to time with news about the Library, details of upcoming events and products, and opportunities to support the Library and its projects. These messages are part of your membership; without them you will find it difficult to use the benefits of your membership such as priority booking and access to Members only special events. However, if you do not want to receive such messages you may opt out of receiving them at the time of purchase, or by contacting us in writing.

We may analyse your use of your Membership in order to carry out our legitimate interests in monitoring, auditing, and developing the Services that we provide.

We will retain your Membership information for as long as it remains current, plus a further six years after the date of your last interaction with us so as to provide evidence in the face of future complaints or legal claims. Transactional information will be retained for the year in which the transaction took place, and then for a further six years in order to comply with tax and accounting rules.

Public Lending Right (PLR)

When you create a PLR account we will collect your contact details, details of the publications which you wish to register, and your financial details.

We will use these details to administer the PLR payment scheme, as part of a task performed in the public interest. Further details about our public task can be found **here**.

We may also use this data for the purpose of analysis in support of service improvement, IT security, or other legitimate interests of the Library.

You can access your account at <https://www.plr.uk.com/olga/login.aspx>, in order to make corrections to your personal information or manage your registered publications.

We will retain your PLR account information for as long as your account remains current plus a further six years in order to comply with tax and accounting rules and to provide evidence in the face of future complaints or legal claims. We may retain information about PLR payments (which may include your name and correspondence) for longer if we believe such information is likely to be of importance to future research.

In relation to the Irish PLR scheme, the British Library acts as a data processor for the Local Government Management Agency (LGMA), who are the Data Controller in relation to all personal data used to administer the Irish PLR Scheme. As part of our contract with LGMA we will administer any personal data that we receive in relation to the Irish PLR scheme in accordance with the British Library Privacy Policy.

Reader Registration

When you apply to become a Reader at the British Library we will collect information about you including your contact details, date of birth, contact details for your sponsor (if you are under 18), and details of your research interests. We will use these details to provide you with access to the British Library (e.g. as part of the performance of a task carried out in the public interest). We will also collect details about your ethnicity and any disability you may have; we have a legal obligation to ensure that equality and diversity obligations are being met in relation to access to our public Services.

As part of setting up your Reader account we will also check your proof of ID and proof of address as set out in our Reader Registration process. We will not take copies of the documents that you provide in order for us to confirm your ID. We will take a photograph of you for use on your Reader pass. As you use the Library we will also record your interactions with our Collections, such as your order history and audit trails of which electronic items you have accessed. Again, this is part of the performance of a task carried out in the public interest; the British Library has a statutory responsibility to protect the security of its Collections. Further details about our public task can be found [here](#).

Details relating to the specific Collection Items that you have requested during your use of our Collections (for example through use of our Reading Rooms or our remote Services such as Document Supply) will never be used to provide marketing analysis or similar functions (for example, to send you personalised marketing material), but may be used on an aggregated and depersonalised basis for Service improvement purposes (for example, to determine whether we are purchasing enough journals in a specific foreign language to match our Readers' research interests).

Upon request we will routinely provide copies of our records to the police in the performance of their legitimate duties. However, in accordance with agreed international ethical standards for libraries, we will not provide details of the specific Collection Items that you have requested during your use of our Collections to any third party unless compelled to do so by law, with two exceptions:

- If we have evidence that gives us reason to believe that you have committed theft or vandalism in relation to our Collections we may choose to pass information about you to other cultural institutions whose Collections may be at risk. This cooperation between cultural bodies is in our own legitimate interests as we seek to protect the national Collections from harm.
- If we have evidence that gives us reason to believe that you have deliberately infringed the intellectual property of a third party through your use of our Collections we may pass your personal information to that third party to enable them to defend their rights. This is to protect our own legitimate interests in protecting the concepts of Library Privilege and Legal Deposit.

We will retain your Reader account and associated audit trails relating to your use of our Collections for 40 years, for the purpose of administering the security of our Collections (e.g. as part of the performance of a task carried out in the public interest). We reserve the right to increase this period as necessary to protect the integrity of the cultural treasures that we preserve on behalf of the nation, in line with our responsibilities as set out in the British Library Act.

Recruitment

When you apply to work at the British Library we will collect information about you including your contact details, previous employment history, education and qualifications, and referee contact details. We will use this information to process your application (e.g. in pursuit of the performance of a contract with you). We will also collect details about your ethnicity, gender, orientation, nationality, and any disability you may have; we have a legal obligation to ensure that equality and diversity obligations are being met in relation to our recruitment processes.

Where we want to disclose your information to a third party, for example, to take up a reference or to carry out a background check for the purpose of pre-employment security vetting, we will not do so without informing you beforehand, unless the disclosure is required by law.

We may use various organisations to provide IT capabilities in support of our Services, and who may process your information on our behalf. These Data Processors will process your information only under contract to the Library, and may not use your information in any other way. In particular, we will use the following system to process your application:

- We use NGA Human Resources, from Northgate Information Solutions Ltd., to process recruitment applications. Northgate may process your information in the United States or elsewhere in the world, and uses EU Standard Contractual Clauses to protect your information. Northgate's Privacy Policy can be found at <https://www.ngahr.com/privacy-policies#NGA%20HR%20Privacy%20Notice>.

Personal information about unsuccessful candidates will be held for 24 months after the recruitment exercise has been completed. It will then be securely destroyed or deleted. We retain statistical information to help to inform and improve our recruitment activities; for the purpose of ethnic monitoring and to obtain workplace statistics on, for example, gender, race, disability and age. The information retained is anonymised so that no individuals may be identified from that data.

Alternatively, if you are successful in taking up employment with us, we will compile a file relating to your employment, beginning with your application information. This information will thereafter be managed in accordance with our Staff Privacy Policy.

Purchases (Incl. BL Shop, & Box Office)

When you purchase goods from us (for example, books, memorabilia, or event tickets) we will collect your contact details, delivery information, and payment details. We will use your information to provide you with the goods that you have purchased (e.g. in the performance of a contract with you). We will also use your contact information in order to supply you with relevant transactional documentation.

We may also use this data (and other data relating to your use of our Services such as audit trails) for the purpose of analysis in support of Service improvement, IT security, or other legitimate interests of the Library.

Online payments by credit or debit cards for some Services provided by the Library are processed under contract using specialist Data Processors, and in line with the Payment Card Industry Data Security Standard. When a payment is processed by Data Processor acting on our behalf, card details are collected over a secure link and protected by industry standard software which encrypts your information. We do not collect any payment card account details and they are not made available to us. Our service provider will use the information you provide to process your payment or to refund any monies due to you. Please refer to the terms and conditions for the relevant Service for further details. In particular, we use the following systems to process your information:

- We use Netbanx, from Paysafe Financial Services Ltd., to process electronic payments. Paysafe's Privacy Policy can be found at <https://www.paysafe.com/legal-and-compliance/privacy-policy/>.
- We use PayPal, from PayPal Services, to process electronic payments. PayPal may process your information in the United States and other areas outside of the EEA, and uses Binding Corporate Rules in order to implement appropriate safeguards in relation to your information. PayPal's Privacy Policy can be found at <https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>.

We will retain your commercial account information for as long as it remains current. Transactional information will be retained for the year in which the transaction took place, and then for a further six years in order to comply with tax and accounting rules.

Social Media

The British Library maintains an official presence on various social media platforms, in pursuit of own legitimate interests in relation to marketing and brand management.

When you engage with us on these platforms the platform owner is the Data Controller, and their own privacy policy applies. We will engage with you on social media only in accordance with these third party privacy policies, and will only contact you directly (e.g. by 'private message') in response to a request or query made by you.

The British Library maintains an official presence on the following platforms:

- Facebook, at <https://www.facebook.com/britishlibrary/>. Facebook's Privacy Policy can be found at <https://www.facebook.com/about/privacy/>.
- Instagram, at <https://www.instagram.com/britishlibrary/>. Instagram's Privacy policy can be found at <https://help.instagram.com/519522125107875>.
- Twitter, at <https://twitter.com/britishlibrary>. Twitter's Privacy Policy can be found at <https://twitter.com/en/privacy>.
- YouTube, at <https://www.youtube.com/user/britishlibrary>. YouTube's Privacy & Safety Centre can be found at https://support.google.com/youtube/topic/2803240?hl=en&ref_topic=6151248.